STATE OF MAINE OFFICE OF SECURITIES 121 STATE HOUSE STATION AUGUSTA, MAINE 04333-0121

IN RE:

Ohanesian/Lecours, Inc. and Richard Hammond

CONSENT AGREEMENT No. 12-8149-CAG

This Agreement is entered into between the State of Maine Office of Securities (the "Office") and Ohanesian/Lecours, Inc. (CRD #23757) ("OLI" or the "firm"), an Investment Adviser with its principal place of business located at 433 South Main Street, Suite 104, West Hartford, Connecticut, and Richard Hammond (CRD #1439949), an investment adviser representative affiliated with OLI.

WHEREAS, the parties agree as follows:

- 1. At all relevant times, it has been unlawful in Maine for an individual to transact business as an investment adviser representative unless the individual is licensed or exempt from licensing pursuant to §16404 of the Maine Uniform Securities Act (the "Act").
- OLI is a federal covered investment adviser and has been noticed filed in Maine since April of 1997.
- 3. On March 22, 2012, OLI self-reported to the Office that Hammond had been working as an investment adviser representative of OLI with clients in Maine since January of 2003 without being properly licensed.
- 4. Hammond became licensed as an investment adviser representative in Maine on March 23, 2012.
- 5. OLI attributed its failure to discover that Hammond was not licensed as an investment adviser representative to an oversight.
- 6. OLI and Hammond have fully cooperated with the Office.
- 7. All parties desire an expeditious resolution of this matter.
- 8. OLI and Hammond waive their right to a hearing and to judicial review and both consent to the entry of this agreement.

NOW THEREFORE, without trial or adjudication of any issue of fact or law, it is agreed that:

- 1. OLI and Hammond shall comply with all licensing and other legal requirements governing persons acting as investment advisers or investment adviser representatives in the State of Maine at all times from the date hereof;
- 2. OLI shall not bill for and Hammond shall not collect any advisory fees that may remain outstanding for investment advisory services rendered by Hammond prior to March 23, 2012;
- 3. In lieu of the Office seeking the imposition of a penalty for the conduct discussed herein, OLI will pay the sum of \$12,500 and Hammond the sum of \$2,000 via check or checks made payable to "Treasurer, State of Maine" and is due by July 2, 2012.
- 4. OLI shall pay the renewal fees for the years 2004 to 2011 in an amount of \$30 per year, for a total of \$240 via check made payable to "Treasurer, State of Maine" and is due by July 2, 2012. OLI is not precluded from recouping these licensing fees from Hammond if that is consistent with the firm's practice or any existing employment agreement.
- 5. Failure by either party to include payment with the signed copy of the Consent Agreement will suspend final execution of this Agreement by the Securities Administrator, at her discretion, until payment is received;
- 6. The Office will not take further action against OLI or Hammond based solely upon Hammond's unlicensed status during the period from January of 2003 until March 23, 2012, PROVIDED, however, that this paragraph applies only to the activities previously disclosed to the Office by OLI; and
- 7. Failure by OLI or Hammond to adhere to the above conditions may constitute grounds for the Office of Securities to take any other appropriate actions.

Date

Richard Ohanesian, President Ohanesian/Lecours, Inc.

<u>///20/2</u> Date

6/5/2012 Date

Date

Richard Hammond

Judith M. Shaw
Securities Administrator

Michael J. Colleran

Assistant Attorney General